

**OFFICE OF STATE ETHICS**

DOCKET NUMBER 2009-75	:	OFFICE OF STATE ETHICS
	:	
IN THE MATTER OF A	:	18-20 TRINITY STREET
	:	
COMPLAINT AGAINST	:	HARTFORD, CT 06106
	:	
DAVID G. CARTER	:	JANUARY 10, 2011

**AMENDED COMPLAINT**

**COUNT ONE:**

1. Beginning on or about October 10, 2006 and continuing through the date of this Complaint, David G. Carter ("Dr. Carter" or "Respondent") was Chancellor of the Connecticut State University System.
2. At all times relevant hereto, Dr. Carter was a "state employee", as that term is defined by General Statutes §1-79(m).
3. At all times relevant hereto, as Chancellor of the Connecticut State University System, Dr. Carter retained and exercised authority to take actions that affected the financial interests of administrators, including the deans, of each of the state universities that comprise the Connecticut State University System. Included in this authority was the authority to establish or influence financial compensation, hire or fire, and approve temporary replacements for vacant positions.
4. At all times relevant hereto, Dr. Carter was married to a dean at one of the universities that comprise the Connecticut State University System.
5. Pursuant to §1-86(a) of the General Statutes:

Any public official or state employee... who, in the discharge of [his] official duties, would be required to take an action that would affect a financial interest of... such official's or employee's spouse... has a potential conflict of interest. Under such circumstances, such official or employee shall... prepare a written statement signed under penalty of false statement describing the matter requiring action and the nature of the conflict and deliver a copy of the statement to such official's or employee's immediate superior, if any, who shall assign the matter to another employee, or if such official or employee has no immediate supervisor, such official shall take such steps as the Office of State Ethics shall prescribe or advise.

6. Beginning on or about October 10, 2006 and continuing through the date of this Complaint, Dr. Carter was, in the discharge of his official duties, required to take various actions that would affect the financial interest of his spouse
7. Each time Dr. Carter was required to take action affecting the financial interest of his spouse, Dr. Carter was required to prepare a written statement, signed under penalty of false statement, describing the matter requiring action and the nature of the conflict and deliver a copy of the statement to the Board of Trustees of the Connecticut State University System.
8. Beginning on or about October 10, 2006 and continuing through the date of this Complaint Dr. Carter, when required to take action affecting the financial interest of his spouse, did not prepare a written statement and deliver it to his superior, the Board of Trustees of the Connecticut State University System.
9. Beginning on or about October 10, 2006 and continuing through the date of this Complaint Dr Carter, when required to take action affecting the financial interest of his spouse, did not contact the Office of State Ethics to solicit advice.
10. Instead, beginning on October 10, 2006 and continuing through the date of this Complaint, Dr. Carter attempted to recuse himself from taking actions affecting the financial interests of his spouse by establishing an informal policy whereby he referred such matters to the Associate Vice Chancellor for action.
11. At all times relevant hereto, the Associate Vice Chancellor was a direct subordinate of Dr. Carter.
12. By failing to prepare a written statement to the Board of Trustees of the Connecticut State University System as set forth herein, Dr. Carter violated §1-86(a) of the General Statutes.

PRAAYER FOR RELIEF

WHEREFORE, the Office of State Ethics prays for the following relief:

1. Pursuant to General Statutes §1-88(a), an Order mandating that the Respondent cease and desist from any future violation of General Statutes §1-86(a).
2. Pursuant to General Statutes §1-88(a)(3), an Order mandating the payment of civil penalties to the State, not to exceed \$10,000, for Respondent's violation of General Statutes §1-86(a).

Dated at Hartford, Connecticut this 10th day of January, 2011.

THE OFFICE OF STATE ETHICS

BY: \_\_\_\_\_

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